

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KEITH MCBROOM,

Plaintiff,

v.

LVNV FUNDING, LLC,

Defendant.

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CASE NO. 2:21-cv-1218

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant LVNV Funding, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Allegheny County, Pennsylvania and in support thereof avers as follows:

1. LVNV Funding, LLC is a defendant in a civil action originally filed on February 23, 2021 in the Court of Common Pleas of Allegheny County, Pennsylvania titled *Keith McBroom v. LVNV Funding, LLC* and docketed to Case No. GD-21-001476.

2. The removal is timely under 28 U.S.C. § 1446(b). Plaintiff's Complaint was filed on July 30, 2021. LVNV's counsel was provided with a copy of the Complaint by email on August 13, 2021. LVNV later received service of Plaintiff's Complaint by first class mail August 19, 2021.

3. Pursuant to 28 U.S.C. § 1446, copies of all process, pleadings and orders filed in the state court action are attached as exhibits to this Notice.

4. The District Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against LVNV alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, LVNV has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE, Defendant LVNV Funding, LLC respectfully removes this case to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
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Counsel for Defendant

Dated: September 13, 2021

CERTIFICATE OF SERVICE

I certify that on September 13, 2021, a true copy of the foregoing document was served on all counsel of record by electronic service.

MESSER STRICKLER, LTD.

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